

**From:** Snouwaert, Elaine (ECY)  
**Sent:** Tuesday, December 05, 2006 9:05 AM  
**To:** 'Tyson.Clyne@deq.idaho.gov'; Robert.Steed@deq.idaho.gov  
**Cc:** Traeumer, Drea (ECY); 'Dee A. Bailey'; Ragsdale, Dave; Knight, David T. (ECY)  
**Subject:** Hangman Creek TMDL  
Tyson & Bob,

Joe Joy (my technical counterpart) and I have been reviewing your draft TMDL for Hangman Creek. We are concerned about your recommendation to de-list Hangman Creek for nutrients above the tribal boundary (p. xiv, p. 30, p34). We understand Idaho not pursuing a nutrient TMDL at this time because data are lacking; however we would like to request that you not de-list Hangman Creek for nutrients at this time.

As you know, we are also developing a TMDL for the Washington portion of the creek. Our Hangman Creek TMDL phosphorus loading capacity will be based, in part, on an allocation set at the mouth by the Spokane River TMDL to control dissolved oxygen deficits in Lake Spokane. Although the final allocation to Hangman Creek is still in flux, earlier drafts indicated that our natural condition calculations may be lower than your estimates of reference conditions in the upper watershed (0.02mg/L & 0.04mg/L, respectively).

As you're aware, we are in the process of evaluating the phosphorus loads in the entire watershed by using a landscape model. The model should provide seasonal and annual estimates of background phosphorus levels throughout the watershed. If the Washington and the Coeur d'Alene Tribes TMDL efforts indicate that upstream reductions are needed to meet downstream water quality standards and beneficial uses, we fear that a de-listing by Idaho and a high reference concentration estimate in the headwaters could make future nutrient TMDL efforts more difficult. We would like to request that you include language in the TMDL to indicate that although you are not doing a TMDL for nutrients now, downstream TMDLs may necessitate a second look in the future. I think its important to communicate to the advisory group and the public that nutrients may need to be revisited.

Thanks for considering our comments.  
Elaine

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